

Viking CCS Pipeline

6.7.2 Draft Biodiversity Net Gain Strategy

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1. Introduction

- 1.1.1 AECOM Ltd was commissioned by Chrysaor Production (U.K.) Limited, a Harbour Energy company (hereafter referred to as the 'Applicant') to undertake an Initial Biodiversity Net Gain (BNG) Assessment of the permanent above ground development associated with the Viking CCS Pipeline (hereafter referred to as the 'Proposed Development'). The assessment is provided in *Application Document 6.7.1 Initial Biodiversity Net Gain Assessment*.
- 1.1.2 Landscape Plans (*Application Document 6.8*) detailing the landscaping and permanent development areas within the Order Limits have been used to undertake the assessment and as a collective are hereafter referred to as 'the Site'. The initial BNG assessment has been undertaken to provide an initial quantification of the overall effect of the Proposed Development on the biodiversity value of the Site. This is achieved by comparing the Site's baseline habitat value with that of the constructed Proposed Development. Calculations consider the level of proposed permanent habitat loss, retention, enhancement and/or creation delivered by the Proposed Development. This approach has been guided by Natural England's Biodiversity Metric 4.0¹ in accordance with associated guidance documents² and best practice principles³, but modified in line with the Applicant's proposed approach of achieving 10% biodiversity net gain relating to permanent habitat losses at the above ground installations.
- 1.1.3 This draft Biodiversity Net Gain Strategy document explores opportunities for offsetting the habitat losses arising from the Scheme. The details of the initial BNG Assessment can be found in the *Initial Biodiversity Net Gain Assessment (Application Document 6.7.1)*. The opportunities set out in this report have been collated in order to satisfy all trading rules and achieve the BNG target set by the Applicant.
- 1.1.4 In line with the mitigation hierarchy, the on-site enhancement and creation measures should be favoured with remaining units that cannot be achieved on-site (within the above ground installations) delivered 'off-site' (including elsewhere within the Order limits). The habitat provision within the Site, as detailed within the Landscape Plans has been maximised and therefore it is deemed that the additional units required for achieving a 10% net gain whilst satisfying all trading rules must be provided off-site. Therefore, this document focuses solely on off-site habitat provisions (i.e., outside of the above ground installations).
- 1.1.5 This document is not to be considered as a final iteration, and it is expected that the document will be updated as proposals for BNG are developed, including through stakeholder engagement following submission of the application.

¹ Natural England (2023). [The Biodiversity Metric 4.0](#).

² Natural England (2023). The Biodiversity Metric 4.0 – [User Guide](#), [Technical Annex 1](#) & [Technical Annex 2](#).

³ CIEEM, IEMA & Ciria (2019). [Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide](#)

1.2 Site Description

- 1.2.1 The Proposed Development, indicated by the Order Limits, is detailed on the 'Baseline Habitat Plan' (Appendix A of document 6.7.1 *Initial Biodiversity Net Gain Assessment (Application Document 6.7.1)*). The Site largely comprises arable fields, with areas of improved and semi-improved grassland, bare ground and floodplain grassland. Hedgerows are incorporated within the Site along with watercourses (inclusive of a length of ditches and one culvert). The Northern end of the Site incorporates the current Immingham industrial area. At this time the final design for the Southern end of the Proposed Development at Theddlethorpe has yet to be finalised, with facilities to be located either on the site of the former Theddlethorpe gas terminal (Option 1) or on agricultural land immediately to the west of this site (Option 2). As Option 2 represents the more impactful in terms of loss of habitat, the Initial Biodiversity Net Gain Assessment assumed that option will be developed.
- 1.2.2 The Theddlethorpe end of the Site incorporates Saltfleetby – Theddlethorpe Dunes which is designated as a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC), Gibraltar Point SAC and the Humber Estuary which is designated as a Ramsar Site and a Special Protection Area (SPA). All designated areas have been avoided and will not be directly impacted by the works.

1.3 Proposed Development

- 1.3.1 The Proposed Development comprises a new 24 " (609 mm) diameter onshore pipeline of approximately 55.5 km in length, which will transport Carbon Dioxide (CO₂) from the Immingham industrial area to the Theddlethorpe area on the Lincolnshire coast, where it will connect into the existing 36 " (921 mm) diameter offshore LOGGS pipeline.
- 1.3.2 The Proposed Development is an integral part of the overall Viking CCS Project, which intends to transport compressed and conditioned CO₂ received at a facility at Immingham to store in depleted gas reservoirs under the Southern North Sea. The offshore elements of the Viking CCS Project, including the transport of CO₂ through the LOGGS pipeline to the Viking gas fields under the North Sea, are subject to a separate consenting process.
- 1.3.3 The key components of the Proposed Development comprise:
- Immingham Facility;
 - Three Block Valve Stations;
 - Theddlethorpe Facility (as noted above there are two potential sites for this part of the development, the assessment assumed Option 2 would be used);
 - Existing LOGGS pipeline and isolation valve to the extent of the Order Limits at Mean Low Water Springs (MLWS);
 - Permanent access to facilities; and
 - Mitigation and landscaping works.

- 1.3.4 Further details of each element of the Proposed Development are set out in *Environmental Statement Volume II Chapter 3 Description of the Proposed Development (Application Document 6.2.3)*.

2. Policy context

2.1 BNG Legislation and Policy Background

National Legislation and Policy

- 2.1.1 The Environment Act⁴ includes provisions to make BNG a requirement for developments consented via the Town and Country Planning Act 1990. It is currently anticipated these requirements will be introduced in January 2024.
- 2.1.2 The Environment Act also includes provisions that would make BNG a requirement for Nationally Significant Infrastructure Projects (NSIP) (such as the Proposed Development), however there is no fixed timeline for these to be brought into force and it is not expected to apply to NSIP applications until at least November 2025. As such, there is no legal obligation under the Environmental Act 2021 or otherwise on the Proposed Development to provide BNG as part of this development.
- 2.1.3 It is government policy that “*planning decisions should minimise impacts on and provide net gain for biodiversity*”, as stated within the NPPF⁵.
- 2.1.4 The Overarching National Policy Statement for Energy (EN-1)⁶ states the following regarding habitat losses and biodiversity:
- ‘The NPS The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests’;
 - ‘As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought.’; and
 - The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:
 - during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;
 - during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements;

⁴ UK Government (2021). [The Environment Act](#)

⁵ UK Government (2023). [National Planning Policy Framework](#)

⁶ [Overarching NPS for Energy \(EN-1\)](#)

- habitats will, where practicable, be restored after construction works have finished; and
 - opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.’
- 2.1.5 The specific NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)⁷ states the following regarding biodiversity:
- ‘The ES should include an assessment of the biodiversity and landscape and visual effects of the proposed route and of the main alternative routes considered (see Section 5.9 of EN-1). The application should also include proposals for reinstatement of the pipeline route as close to its original state as possible and take into account any requirements for agreements with the landowner to access areas for aftercare and management work. Where it is unlikely to be possible to restore landscape to its original state, the applicant should set out measures to avoid, mitigate, or employ other landscape measures to compensate for, any adverse effect on the landscape’

Local Policy

- 2.1.6 For planning context, the following local planning policies are relevant to the Proposed Development and biodiversity net gain.
- 2.1.7 The Central Lincolnshire Local Plan⁸ includes the following policies relating to BNG:
- **Policy S60: Protecting Biodiversity and Geodiversity:** “All development should: protect, manage, enhance and extend the ecological network of habitats, species and sites of international, national and local importance (statutory and non-statutory), including sites that meet the criteria for selection as a Local Site”; and
 - **Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains:** “The following part of the policy applies unless, and until, subsequently superseded, in whole or part, by national regulations or Government policy associated with the delivery of mandatory biodiversity net gain arising from the Environment Act 2021. Where conflict between the policy below and the provisions of Government regulations or national policy arises, then the latter should prevail. All qualifying development proposals must deliver at least a 10% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Natural England’s Biodiversity Metric.”
- 2.1.8 The North Lincolnshire Core Strategy includes the following policy relating to BNG:
- **Policy CS17: Biodiversity:** “The council will promote effective stewardship of North Lincolnshire’s wildlife through: Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for”.

⁷ [NPS for Gas Supply Infrastructure and Gas and Oil Pipelines \(EN-4\)](#)

⁸ [Central Lincolnshire Local Plan](#)

2.1.9 North-East Lincolnshire Local Plan⁹ includes the following policies relating to BNG:

- **Policy SO6: Built, historic and natural environment:** “Direct development to locations of least environmental value and proactively manage development to deliver net gains in biodiversity overall.” ; and
- **Policy 41: Biodiversity and Geodiversity:** “C. Protect manage and enhance international, national and local sites of biological and geological conservation importance, having regard to the hierarchy of designated sites, and the need for appropriate buffer zones; D. Minimise the loss of biodiversity features, or where loss is unavoidable and justified ensure appropriate mitigation and compensation measures are provided; E. Create opportunities to retain, protect, restore and enhance features of biodiversity value, including priority habitats and species”.

2.1.10 The East Lindsey Core Strategy¹⁰ includes the following policy relating to BNG:

- **Strategic Policy 24 (SP24) – Biodiversity and Geodiversity:** “Development proposals should seek to protect and enhance the biodiversity and geodiversity value of land and buildings, and minimise fragmentation and maximise opportunities for connection between natural habitats.”

2.2 Harbour Energy’s Biodiversity Net Gain Position

2.2.1 Although delivery of BNG is not a legal or national policy requirement for NSIPs, the Applicant recognises the importance of BNG and is committed to delivering BNG that is proportionate to a project of this type. As delivery of BNG is not currently mandatory for NSIPs, it is not possible for the Applicant to take rights over land compulsorily for the purpose of delivering BNG, and opportunities to deliver BNG on site, as part of a buried pipeline project, are understandably limited.

2.2.2 The majority of the pipeline crosses through arable land and delivering 10% net gain on this temporary habitat loss, which will be fully reinstated and back in use for arable production in less than two years, is not considered to be a proportionate response. Furthermore, throughout the extensive pre-application consultation undertaken by the Applicant, the feedback received was that having the pipeline route restored for agricultural use post-construction was a priority for landowners. This also has the effect of limiting the practical ability to deliver BNG on the pipeline route, which can only be done through voluntary agreement. Notwithstanding that, the Applicant is continuing to explore BNG opportunities with landowners through voluntary negotiation.

2.2.3 However, the Applicant considers that where there will be a permanent loss of habitat at the above ground facilities, including their associated permanent access points and access tracks, it is proportionate to commit to delivering BNG. As such the Applicant has made a voluntary commitment to deliver a

⁹ [North East Lincolnshire Local Plan](#)

¹⁰ [East Lindsey Local Plan Core Strategy](#)

10% net gain in biodiversity relating to the permanent habitat losses at the Immingham Facility, Theddlethorpe Facility, and Block Valve Stations. This strategy sets out further detail on the opportunities that have been identified to achieve this aim and the practical steps that the Applicant will take to deliver this.

- 2.2.4 It is recognised that there will be some small areas of habitat along the pipeline route that will not be fully restored within 2 years, for example hedgerows, grassland, woodland and ditches. Further assessment of these losses is proposed to be undertaken once the Front End Engineering Design (FEED) has been completed, and a more accurate understanding of potential losses can be gained.
- 2.2.5 The Applicant intends for this strategy to remain a live document. Opportunities for enhancement beyond the current target will remain under review and be developed further with relevant stakeholders post-consent.

3. Biodiversity Metric

3.1 BNG Summary Calculations and Trading Rules

- 3.1.1 Detailed results are located in the Initial Biodiversity Net Gain Assessment (*Application Document 6.7.1*).
- 3.1.2 All baseline habitats and habitats created and retained are present within the *Application Document 6.7.1 Initial Biodiversity Net Gain Assessment*.
- 3.1.3 Landscaping has been proposed at Block Valve Stations and at the Theddlethorpe facility (see *Landscape Plans (Application Document 6.8)*). This landscaping has been included in the post-development calculations within the Initial Biodiversity Net Gain report.
- 3.1.4 A summary of the results is provided in Table 1. Based on the current Post-Development Plan, the Proposed Development is predicted to result in a net loss of 2.83 habitat units (-33.19%), a net gain of 2.11 hedgerow units (2138.49%) and a net loss of 0.12 watercourse units (-66.68%).

Table 1. Summary of Results

Habitat Type	Baseline	Post-Development	Total Net Unit Change	Total Net % Change
Area-Based Units	8.53	5.70	-2.83	-33.19%
Hedgerow Units	0.10	2.62	2.52	2562.26%
Watercourse Units	0.18	0.06	-0.12	-66.68%

Trading Rules

- 3.1.5 The trading rules within the Biodiversity Metric 4.0¹ are a set of rules that try to prevent the 'trading down' of habitat distinctiveness. Under the trading rules

losses of habitat are to be compensated for on a “like for like” or “like for better” basis.

Area-Based Habitats

3.1.6 For area-based habitats, the trading rules for High and Medium Distinctiveness habitats within the Biodiversity Metric 4.0¹ are currently not satisfied, however Very High Distinctiveness habitats are satisfied (see Table 2), changes in broad habitat types are detailed below (Table 3).

Table 2. Trading Rules Summary – Area-Based Habitats

Distinctiveness Group	Trading Rule	Trading Satisfied?
V. High	Bespoke compensation likely to be required	Yes
High	Same habitat required	No
Medium	Same broad habitat or a higher distinctiveness habitat required	Yes
Low	Same distinctiveness or better habitat required	No

3.1.7 Table 3 shows the overall change in broad habitat types. There is an overall loss of ‘Cropland’ and ‘Urban’ habitats and an overall gain for ‘Grassland’ and ‘Woodland and forest’ habitats. The trading rules are used to ensure there is no loss of valuable habitat types, and those of lower value are compensated on a like-for-like or by a better value habitat basis.

Table 3. Change by Broad Area-Based Habitat Type

Habitat group	Baseline		Post development		Change	
	Existing area	Existing value	Proposed area	Proposed value	Area change	Unit change
Cropland	2.83	5.66	0.00	0.00	-2.83	-5.66
Grassland	0.07	0.81	0.59	3.26	0.52	2.46
Urban	1.05	2.06	2.89	0.00	1.84	-2.06
Woodland and forest	0.00	0.00	0.47	2.43	0.47	2.43

Hedgerow Habitats

3.1.8 For hedgerow habitats, the trading rules within the Biodiversity Metric 4.0¹ are currently not satisfied for each distinctiveness level (see Table 4).

Table 4. Trading Rules Summary – Hedgerow Habitats

Distinctiveness Group	Trading Rule	Trading Satisfied?
High	Same habitat required	No

Distinctiveness Group	Trading Rule	Trading Satisfied?
Medium	Same broad habitat or a higher distinctiveness habitat required	Yes
Low	Same distinctiveness or better habitat required	Yes

3.1.9 Table 5 shows the overall change in hedgerow habitat types. There is an overall loss of, ‘Native hedgerow with trees - associated with bank or ditch’ and ‘Native hedgerow with trees’. There is an overall gain of ‘Species-rich native hedgerow with trees’, ‘Native hedgerow’ and ‘Line of Trees’ Habitats. There are no overall gains for any hedgerow habitats.

Table 5. Change by Hedgerow Type

Hedgerow type	Baseline		Post development		Change	
	Existing length	Existing value	Proposed length	Proposed value	Length change	Unit change
Species-rich native hedgerow with trees	0.00	0.00	0.14	1.39	0.14	1.39
Native hedgerow with trees – associated with bank or ditch	0.01	0.03	0.00	0.00	-0.01	-0.03
Species-rich native hedgerow	0.00	0.00	0.10	0.79	0.10	0.79
Native hedgerow with trees	0.01	0.06	0.00	0.00	-0.01	-0.06
Native hedgerow	0.00	0.00	0.09	0.33	0.09	0.33
Line of trees	0.00	0.01	0.05	0.11	0.05	0.10

Watercourse Habitats

3.1.10 For watercourse habitats, the trading rules are currently satisfied for each distinctiveness level (see Table 6).

Table 6. Trading Rules Summary – Watercourse Habitats

Distinctiveness Group	Trading Rule	Trading Satisfied?
Medium	Same broad habitat or a higher distinctiveness habitat required	No
Low	Same distinctiveness or better habitat required	Yes

3.1.11 Table 7 shows the overall change in broad habitat types. There is an overall loss of ‘Ditches’ and a minimal increase in ‘Culvert’ units.

Table 7. Change by Watercourse Type

Habitat group	Baseline		Post development		Change	
	Existing length	Existing value	Proposed length	Proposed value	Length change	Unit change
Ditches	0.00	0.20	0.00	0.00	0.00	-0.20
Culvert	0.00	0.00	0.00	0.1	0.00	0.00

4. Biodiversity Net Gain Opportunities

4.1 Off-Setting Opportunities Area-Based Habitats

4.1.1 Opportunities for enhancement should focus on both increasing the unit score (a total of 3.68 units are required to achieve up to a 10% net gain) whilst also satisfying the trading rules.

4.1.2 In order to satisfy the trading rule for ‘High’ distinctiveness habitats ‘Grassland – Floodplain wetland mosaic and CFGM’ habitat must be created and/or enhanced.

4.1.3 ‘To satisfy the trading rule for ‘Medium’ distinctiveness habitats a length of ‘Ditches’ must be created and/or enhanced.

4.1.4 In order to satisfy the ‘Low’ distinctiveness trading rule, the following habitats or habitats of a higher distinctiveness, which can include habitats within a different broad habitat type, could be created and/or enhanced:

- ‘Cropland – Cereal crops’;
- ‘Urban – Bare ground’.

4.1.5 To sufficiently increase the biodiversity unit score whilst also satisfying the trading rules, on-site and off-site enhancement options are recommended below.

4.1.5.1 Off-site Area-Based Habitat Off-Setting Opportunities

- Opportunity 1 (Off-site) – Enhance floodplain to a better condition:
 - Enhance a 0.25 ha off-site area of ‘Grassland – Floodplain wetland mosaic and CFGM’ of Poor condition to Moderate condition.

- Opportunity 2 (Off-site) – Creation of other neutral grassland and mixed scrub:
 - Loss of 0.62 ha of off-site ‘Cropland – Cereal crops’ and creation of 0.4 ha ‘Grassland – Other neutral grassland’ of Moderate condition and 0.22 ha ‘Heathland and shrub – Mixed scrub’ of Moderate condition.

4.1.6 Table 8 summarises the results following the opportunities detailed above.

Table 8. Summary of Off-Site area-based Opportunities

On-Site Baseline	On-site Post-development	Off-site Baseline	Off-site Post-development	Total unit change (on-site and off-site)	Total net % change
8.53	5.70	2.97	6.69	+0.89	10.42%

Hedgerow Habitats

4.1.7 Opportunities for enhancement should focus satisfying the trading rules as a substantial net gain is already being achieved (2562.26%). Table 9 summarises the results following the opportunities detailed below.

4.1.8 In order to satisfy the trading rule for ‘High’ distinctiveness, a length of ‘Native hedgerow with trees – associated with bank or ditch’ must be created and/or enhanced.

- Opportunity 1 (Off-site) – Enhancement of ‘Native hedgerow with trees – associated with bank or ditch’:

Enhancement of a 0.018 km off-site length of ‘Native hedgerow with trees – associated with bank or ditch’ of Poor condition to ‘Species-rich native hedgerow with trees – associated with bank or ditch’ of Poor condition.

4.1.9 The off-site enhancement will result in all trading rules being satisfied as well as increasing the net gain for hedgerow habitats.

Table 9. Summary of Off-Site hedgerow Recommendations

On-site Baseline	On-site Post-development	Off-site Baseline	On-site Post-development	Total unit change	Total net % change
0.10	2.62	0.12	0.16	+2.56	+2597.43%

Watercourse Habitats

4.1.10 In order to satisfy the trading rule for ‘Medium’ distinctiveness habitats a length of ‘Ditches’ must be created and/or enhanced.

4.1.11 On-site opportunities focus on the enhancement of ditch riparian zones, outside the area of permanent works, by increasing the grassed buffers on either side of the ditches, which leads to a decrease in riparian encroachment.

Table 10 summaries the unit uplift and subsequent net gain resulting from the enhancement opportunities.

- Opportunity 1 (On-site but outside the area of permanent works) – Enhancement of ditch riparian zones: Enhancement of 0.14 km ‘Ditches’ at Moderate condition by decreasing the riparian encroachment from ‘Moderate/Moderate’ to No Encroachment.

Table 10. Enhanced Watercourse Habitats Riparian Encroachment Change

On-Site Baseline	On-site Post-development	Off-site Baseline	Off-site Post-development	Total unit change	Total net % change
0.18	0.06	0.95	1.12	+0.05	+26.12% ¹¹

5. BNG Delivery Strategy

5.1.1 As set out above, preliminary landscape designs in the *Outline Landscape and Ecological Management Plan (Application Document 6.8)* will deliver new habitat at the above ground installations and block valve stations, presenting potential BNG opportunities. Other potential enhancement opportunities outside of the areas of permanent above ground infrastructure are summarised above and include:

- Enhancing floodplain to a better condition;
- Creation of other neutral grassland and mixed scrub;
- Enhancement of native hedgerows;
- Enhancement of ditch riparian zones.

5.1.2 There may be other off-site enhancement opportunities to replace arable land with other habitats of higher distinctiveness (e.g., scrub, grassland, woodland) or increasing arable margins. The Applicant has already engaged with landowners about the potential for enhancement measures being delivered on their land through voluntary agreements.

5.1.3 With the exception of the measures delivered at the areas of permanent above ground infrastructure and through the OLEMP, BNG would be secured via landowner agreements, and agreed post-consent. BNG opportunities will be developed further with stakeholders post-consent, with more detailed and refined calculations provided once the FEED design is finalised. The Applicant has undertaken early engagement work with local organisations, such as the Lincolnshire Chalk Streams Project, that are focused on enhancing biodiversity and achieving nature recovery/restoration. The Applicant aims to build on this early engagement to maximise the impact of its BNG activities in the local area.

5.1.4 The Applicant therefore considers that through this strategy, building on the early engagement that has taken place, it will be possible to deliver the

¹¹ The stated Net Gain is in relation to one area of permanent ditch habitat lost relating to the above ground facilities. Additional impacts to ditch habitats have currently been excluded from the Metric calculations and will be considered further following FEED design.

Applicant's target of 10% net gain in biodiversity relating to the permanent habitat losses at the above ground infrastructure.

6. Summary and BNG Implementation for the Proposed Development

- 6.1.1 Areas of permanent habitat loss related to above ground installations are predicted to result in a net loss of 7.44% for area-based habitat units, a net loss of 30.24% for hedgerow units and a net loss of 0.68% for watercourse units. Areas of temporary habitat loss will be reinstated within 2 years (where possible), and have therefore been excluded from these metric calculations. As noted in section 2.2, areas of temporary habitat loss will be reinstated within 2 years (where possible), and have therefore been excluded from these metric calculations.
- 6.1.2 Potential off-site opportunities (i.e., outside of the above ground installations but potentially within the Order limits) have been explored. These have been calculated as resulting in a net gain of 10.42% for area-based habitat units, a net gain of 2597.43% for hedgerow habitats and a net gain of 26.12% for watercourse habitats.
- 6.1.3 Therefore, it should be possible to provide the required units to achieve the BNG target for permanent above ground works for all habitat types through off-site measures (potentially within the Order limits).
- 6.1.4 Habitats will be monitored to ensure correct establishment and growth. The management and monitoring will be detailed in a Biodiversity and Environmental Management Plan (BEMP), or similar, and should be in line with (or form part of) the finalised Landscape and Environmental Management Plan (LEMP).

